

24917



State of Idaho  
Department of Environmental Quality  
1410 North Hilton  
Boise, Idaho 83706



U.S. Environmental Protection Agency  
Hanford/INL Project Office  
309 Bradley Boulevard, Suite 115  
Richland, Washington 99352

September 15, 2005

Nolan Jensen, FFA/CO Project Manager  
Department of Energy  
Idaho Operations Office  
1955 Fremont Ave  
Idaho Falls, Idaho 83415

RE: August 26, 2005 Request for Staging Pile Extension to Treat Mercury-Contaminated Soil at the ICDF

Dear Mr. Jensen:

We have evaluated DOE's request for an extension. EPA and DEQ agree that the overall problem is a result of construction schedule and equipment delivery delays, more soil requiring treatment than was anticipated, and an imperfect mixing recipe. Having stated these facts, EPA and DEQ will grant the requested extension, as provided for in the *ICDF Remedial Action Work Plan, See 4.4.2, DOE/ID 10084 Rev 0, Feb 2003*, and consistent with the requirements for staging piles reflected in 40 CFR § 264.554.

Although we are in agreement with the justification for this specific request, we request that future requests for staging pile extensions at WAG 3 and other WAGs provide more comprehensive information to explain in detail what issues arose and what corrections were implemented to try and return to the baseline schedule. Please note that any further request to use this specific staging pile for WAG 4 CFA-04 mercury pond contaminated soils past March 15, 2006 will be denied.

With the upcoming seasonal closure of the ICDF landfill, DOE should explain to EPA and DEQ how the treated waste will be managed during the closure. Additionally, if an "unforeseeable event" arises that DOE knows will in any manner impact the March 15, 2006 extension date, DOE is expected to take whatever action is necessary to ensure that none of these soils are present on the staging pile on March 16, 2006. DOE is encouraged to develop a plan to address this potential situation.

Sincerely,

Daryl F. Koch  
FFA/CO Remediation Manager  
Waste Management and Remediation Division

David R. Einan  
ICDF Project Manager  
Hanford/INL Project Office

DFK:tg cc: daryl@nrc.gov

cc: Source File  
COF

Pat Gibson, DOE  
Jack Simonds, DOE 4142

Mike Spomer, DEQ  
Mahlon Heilesen, CWI